

Q: Who can serve as a DPSAO? Can class societies receive this recognition?

A: A Dynamic Positioning System Assurance Organization (DPSAO) is a third party authorized to conduct DP surveys, plan review, DP investigation reviews, and issue a DP Verification Acceptance Document (DPVAD). A DPSAO can be any organization that meets the criteria in proposed 46 CFR 61.50-3 and is accepted by the OCS NCOE.¹ A third party must demonstrate they have the experience and capabilities to be a DPSAO.

Yes, class societies can receive this recognition after submitting the required information and being accepted by the OCS NCOE. However, a DPSAO that is not a classification society is not authorized to issue DP equipment class 2 or higher notations under 46 CFR 62.40-10.

Q: How will the USCG audit and hold DPSAOs (third party) accountable?

A: A DPSAO must submit to the OCS NCOE an annual report that contains each DP investigation summary reported to it under 33 CFR 140.335(i). If the OCS NCOE is not satisfied with the resolution of any DP incident contained in the annual report, then the OCS NCOE may initiate an audit of the DPSAO or notify the OCMI who may exercise an operational control to resolve the cause of the DP incident. Under 46 CFR 61.50-4, the OCS NCOE may also periodically audit records and revoke acceptance after determining a DPSAO no longer complies with the criteria outlined in 46 CFR 61.50-3(a).

Q: Do I need an endorsement on my license designating me as a Dynamic Positioning System Operator (DPO)?

A: No, there is no endorsement required for your license to be a DPO but there are specific training requirements a DPO must meet to operate the DP system. See proposed regulatory text in 33 CFR 140.315 for the training requirements a DPO must meet.

Q: Can the mate or officer of the watch also serve as the DPO?

A: Yes, as long as the mate or officer holds the appropriate credential for serving as the mate or officer in charge of a navigational watch and the DP system controls are collocated with the navigational equipment.

Q: Is a vessel or MODU underway if using a DP system?

A: Yes, any vessel or MODU using a DP system is considered underway, even if maintaining a fixed position.

If you have specific questions regarding the content of the proposed rule, please contact LT Jeff Bybee, at the Office of Design & Engineering Standards, CG-ENG-1 at 202-372-1357 or jeff.b.bybee@uscg.mil.

If you have commentary on the proposed rule for consideration prior to finalization, please see the [Federal Register Notice](#).

¹ All CFR citations in this FAQ refer to proposed regulations.